



TRADEBE

Environmental Services™

November 14, 2014

UPS 1 Z 698 985 02 9426 5959

USEPA Regional Administrator
Ralph Metcalfe Federal Building
77 West Jackson Blvd.
Chicago, IL 60604-3590

RE: Manifest Discrepancy Letter
Manifest Number: 007064020 FLE
Capps Manufacturing
2120 S. Custer
Wichita, KS 67213

Dear Administrator:

Pursuant to 40 CFR 264.72(a), the purpose of this letter is to address a significant discrepancy for Hazardous Waste Manifest as illustrated. A manifested shipment was received at Tradebe Treatment and Recycling, LLC (Tradebe) facility, USEPA ID number IND000646943, on October 27, 2014.

When the shipment was off loaded by Tradebe's receiving personnel, they noted a piece count discrepancy for one "CF" container identified on page 1, item 9.b.2. The Tradebe Receiving Manager reviewed the shipping documents and the waste containers offloaded; The Receiving Manager confirmed there was a missing container. As Tradebe internal protocol requires, and as assurance to our customers for accuracy, Tradebe personnel requested a third party confirmation of the container count. Tradebe discussed the issue with Mr. Rick Bock, the Schiber Truck Company (Schiber) driver delivering the waste to Tradebe.

Tradebe personnel advised that the container on, Line 9.2.b, identified as a 443 pound "CF" was not delivered to Tradebe. Mr. Rick Bock then stated that to the Tradebe personnel that he remembers that there were not any boxes on his truck when he made the previous delivery at a waste processing facility in Harvey, Illinois.

The details surrounding the shipment of the waste indicates the waste was picked up from the Capps Manufacturing (Capps) facility in Wichita, Kansas by Nexeo Solutions (Nexeo) on October 15, 2014 and transported to a 10 day transfer station in Kansas. From there the waste containers were shipped on October 23, 2014 to a second Nexeo 10 day transfer facility in St. Louis Missouri. On October 24, 2014, the Capps waste was loaded on to a Schiber truck in Saint Louis with other generator's waste for shipment to facilities in the Chicago land region, with Tradebe being one of the facilities.

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LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5

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Following the count discrepancy Tradebe contacted Nexeo personnel and advised them of the issue and based on the internal review and substantiated by the transport driver's statements, Tradebe has concluded that this container was not received at its facility. Therefore, on the enclosed copy of the manifest Tradebe did not amend page 1 Item 9.b. 2, to reflect the actual piece count received; Tradebe made the piece count issue comments on the manifest in Section 18. Discrepancy.

Should you have any questions this matter, please email at tita.lagrimas@tradebe.com or contact me at 219.391.3951.

Respectfully,
Tradebe Treatment and Recycling, LLC



Tita Lagrimas
Executive Vice President of Regulatory Affairs

Enclosure

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number K3R000508432		2. Page 1 of 1		3. Emergency Response Phone NEXEO SOLUTIONS 1-833-638-3548		4. Manifest Tracking Number 007064020 FLE				
		5. Generator's Name and Mailing Address CABES MANUFACTURING 2121 30. EDWARDS WICHITA KS 67217						Generator's Site Address (if different than mailing address) CABES MANUFACTURING 2120 3 CUSTER WICHITA KS 67213				
6. Transporter 1 Company Name NEXEO SOLUTIONS		U.S. EPA ID Number OH R 0 0 0 1 6 2 8 0 0						NEVER WRITE SIDE OF ALL HAZARDOUS MATERIALS BECAUSE IT WILL STICK OUT AND CAUSE DAMAGE				
7. Transporter 2 Company Name Nexeo Solutions		U.S. EPA ID Number 01H00016280										
8. Designated Facility Name and Site Address TRADERE TREATMENT AND RECYCLING LLC 4343 KENNEDY AVE. EAST CHICAGO IN 46312		U.S. EPA ID Number IND 0 0 0 6 4 6 9 4 3						Facility's Phone: 800-388-7242				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	UN1263, WASTE PAINT RELATED MATERIAL, 3, II, RQ(D007), 169-8385 WASTE PAINT LINE FLUSH, FCI#A16983851F				1	DM	492	P	D001	D007	F005
	X	NA3077, HAZARDOUS WASTE, SOLID, H.O.S. (CHROMIUM, METHYL ETHYL KETONE), 9, III, RQ(CHROMIUM), 169-8386 PAINT FILTERS & DEBRIS, FCI#A1698386R3				1	CF	443	P	D007	F005	
		3.										
		4.										
14. Special Handling Instructions and Additional Information 6556923 <div style="text-align: right; font-size: 1.5em;">638254</div>												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offor's Printed/Typed Name DAVE DEPPERSCHMIDT												
Signature <i>Dave Depperschmidt</i>												
Month Day Year 10 15 14												
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____											
	Transporter signature (for exports only): _____											
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials											
	Transporter 1 Printed/Typed Name David Wilson											
Signature <i>David Wilson</i>												
Month Day Year 10 15 14												
Transporter 2 Printed/Typed Name Bobby Dees Jr												
Signature <i>Bobby Dees Jr</i>												
Month Day Year 10 23 14												
DESIGNATED FACILITY	18. Discrepancy											
	18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
	Line 2 was not received by TTR, did not arrive with load. (KAT) 10/27/14											
	Manifest Reference Number: _____ U.S. EPA ID Number _____											
	18b. Alternate Facility (or Generator)											
Facility's Phone: _____ Month Day Year _____												
18c. Signature of Alternate Facility (or Generator)												
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. H141 2. _____ 3. _____ 4. _____												
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name A. Dreyer												
Signature <i>A. Dreyer</i>												
Month Day Year 10 27 14												

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator ID Number	22. Page	23. Manifest Tracking Number		
		KS1000508432	2/2	007064020 F/E		
24. Generator's Name Capps Manufacturing Wichita, KS 67217						
25. Transporter 3		Company Name SCHIEBER TRUCK CO.		U.S. EPA ID Number JL D006493191		
26. Transporter		Company Name		U.S. EPA ID Number		
27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No. Type		29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
TRANSPORTER ONLY						
32. Special Handling Instructions and Additional Information						
33. Transporter 3 Acknowledgment of Receipt of Materials Printed/Typed Name Rick Beck Signature Rick Beck Month 10 Day 24 Year 14						
34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year						
35. Discrepancy						
36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						